

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**ERIN MOORE**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO.: 2:20-CV-209-TBM-MTP**

**CLARKE COUNTY, MS; et al.**

**DEFENDANTS**

**JOINDER**

**COMES NOW**, Defendant, Deputy Ben Ivy, in his individual capacity as a duly commissioned Deputy for Clarke County, MS, by and through counsel, and files this his Joinder in the following:

1. Clarke County, Mississippi, Sheriff Todd Kemp, and Chief Deputy Barry White's Motion for Judgment on the Pleadings as to State Law Claims [**Doc. 33**] and
2. Clarke County, Mississippi, Sheriff Todd Kemp, and Chief Deputy Barry White's Memorandum of Authorities in Support of Motion for Judgment on the Pleadings as to State Law Claims as to Section III. Plaintiff's Pre-Suit Notice of Claim Failed to Comply With the MTCA's Pre-Suit Notice Requirements (pages 13-17) [**Doc. 34**].

This Defendant hereby adopts the assertions, argument and requests for relief in said filings and file this Joinder indicating same.

**RESPECTFULLY SUBMITTED** this the 16<sup>th</sup> day of April, 2021.

**JACKS| GRIFFITH| LUCIANO, P.A.**

By: /s/ Mary McKay Griffith  
Daniel J. Griffith, MS Bar No. 8366  
Mary McKay Griffith, MS Bar No. 100785  
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**CERTIFICATE OF SERVICE**

I, Mary McKay Griffith, attorney of record for Defendant Ben Ivy, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Joinder* to be delivered by the ECF Filing System which gave notice to the following:

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**Attorneys for Clarke County, MS; Sheriff Todd Kemp, Individually and in his Official Capacity as a duly commissioned Sheriff for Clarke County, MS; Chief Deputy Barry White, individually and in his official capacity as a duly commissioned Deputy for Clarke County, MS**

**DATED** this 16<sup>th</sup> day of April, 2021.

/s/ Mary McKay Griffith

Mary McKay Griffith